

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Vagish, LLC, doing business as Cambridge
Plaza Hotel, and Va Va Vagish, LLC, doing
business as Legends Lounge,

Plaintiffs,

vs.

Seneca Specialty Insurance Company,

Defendant.

C/A No.: 3:13-cv-03161-TLW

**JOINT MOTION TO
STAY DEADLINES TO RESPOND
TO MOTIONS *IN LIMINE***

Pursuant to Local Civil Rule 6.01, Plaintiffs Vagish, LLC, doing business as Cambridge Plaza Hotel, and Va Va Vagish, LLC, doing business as Legends Lounge (collectively, Vagish), and Defendant Seneca Specialty Insurance Company (Seneca), respectfully move the Court to stay all deadlines to file memoranda in response to all motions *in limine*.

On March 28, 2016, the parties filed eight motions *in limine*. See Dkt. Nos. 121-128. Responses to these motions are due on or before April 14, 2016. Some of the issues raised by the parties are already at issue in Seneca's pending motion for summary judgment and Vagish's motion to partially strike portions of Seneca's motion for summary judgment. See Dkt. Nos. 101, 104-108, 110, 115, 117 & 120. The Court's ruling on these matters will likely provide considerable guidance concerning the pending motions. Additionally, due to obligations imposed by other matters, the parties' undersigned counsel require some additional time to prepare briefing responsive to the pending motions. The parties state that the deadline has not previously been extended and that staying the current deadline will have no effect on other deadlines.

Therefore, the undersigned request that the Court stay the deadlines for the parties to respond to all motions *in limine* (Dkt. Nos. 121, 122, 123, 124, 125, 126, 127 & 128) until such

time as the Court may direct. The relief sought here will help the parties conserve judicial resources and may allow the parties to better address legal issues of concern to the Court once they have had an opportunity to consider the Court's ruling on those motions fully briefed.

Respectfully submitted this 5th day of April, 2016.

s/Christopher P. Kenney

Richard A. Harpootlian (Fed. ID No. 1730)
rah@harpootlianlaw.com
Christopher P. Kenney (Fed. ID No. 10147)
cpk@harpootlianlaw.com
RICHARD A. HARPOOTLIAN, P.A.
1410 Laurel Street (29201)
Post Office Box 1090
Columbia, South Carolina 29202
(803) 252-4848
Facsimile (803) 252-4810

Leigh J. Leventis (Fed. ID No. 2661)
leighleventis@aol.com
THE LAW OFFICES OF
LEIGH J. LEVENTIS
1913 Bull Street (29201)
Post Office Box 11067
Columbia, South Carolina 29211
(803) 256-0113
Facsimile (803) 799-1612

James M. Griffin (Fed. ID No. 1053)
jgriffin@griffindavislaw.com
Griffin | Davis
1116 Blanding Street (29201)
Post Office Box 999
Columbia, South Carolina 29202
(803) 744-0800

ATTORNEYS FOR PLAINTIFFS

s/Russell Thomson

Russell Thomson, (Fed. ID No. 11870)
rthomson@deflaw.com
Paul W. Burke
Admitted *Pro Hac Vice* (GA Bar No 095642)
pburke@deflaw.com
Eric R. Mull
Admitted *Pro Hac Vice* (GA Bar No 556860)
emull@deflaw.com
DREW ECKL & FARNHAM, LLP
880 W. Peachtree Street
Atlanta, GA 30357-0600
(404) 885-1400

ATTORNEYS FOR DEFENDANT